

Response and Amendment

Applicant Docket No. 05002.1040

REMARKS

In paragraph 1 of the Action, the Office objects to the claims because the lines are crowded to closely together. The claims as presented in this response use one and one-half line spacing and thus, will be easier for the Office to enter amendments.

In paragraphs 2-19, the Office rejects claims 1-25 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Number 6,553,412 issued to Kloba et al. in view of U.S. Patent Number 6,490,601 issued to Marcus et al.

More specifically, with regards to claim 1, the Office alleges that Kloba teaches the user interface as recited. The Office bases this allegation on the following references: Fig. 1 element 112, column 1 lines 40-67, column 10 lines 45-67, column 11 lines 25-55 and column 12 lines 1-40. ~~The applicant respectfully disagrees with the Office's position and presents the following~~
traversal to this rejection.

Claim 1 recites a user interface that exists in a first local application and that enables a user to launch a second local application and a web site from the first local application. Furthermore, the user interface includes a button to display a menu with links to the second local application and the web site.

The Office refers to part 112 of Fig. 1 as support for claim element. Upon examination of Fig. 1, the element 112 refers to a Client Interface Module which enables the client 108 to communicate with adapters, such as communications module 110. Col. 12, lines 24-39. The Office also refers to column 1, lines 40-67 of Kloba. This portion of the Kloba reference describes enabling web content, as well as other objects, to be loaded on to a mobile device and to allow users to operate with such web content on the mobile devices in an interactive manner while working in an off-line mode. The Office also refers to column 10, lines 45-67 of Kloba. This portion of the Kloba reference simply describes that the client device can include a user interface, as well as other modules. The Office also refers to column 11, lines 25-55 of Kloba. This portion of the reference describes the user interface as being a graphical user interface that

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enables users to interact with the client and functions and modules provided by the client. In addition, the user interface controls how functions presented by the modules of the client are presented to users and how users interact with such functions and modules. Kloba also suggests that the user interface can be distributed by having portions of the user interface residing in different modules. Finally, the Office refers to column 12, lines 1-40 of Kloba. This portion of the reference describes a control module that can access information, such as an address book, by interacting with a database module. In addition, a forms module can interact with the database module to access forms that are stored in the database.

The applicant has carefully reviewed the references that have been highlighted by the Office, as well as the entirety of the Kloba reference. The applicant appreciates the Office's careful review of the Kloba reference acknowledging the burden of that task due to the length of the reference. However, the applicant respectfully disagrees with the Office's position regarding the Kloba reference and asserts its own position.

Looking at the user interface recited in claim 1 in greater detail, claim 1 recites the following elements:

- (a) a user interface that exists in a first local application AND
- (b) that enables a user to:
 - (i) launch a second local application AND
 - (ii) a web site from the first local application, AND
- (c) a button to display a menu with links to the second local application and the web site.

The Kloba reference describes a user interface, and it generally describes one module accessing data through another module. However, the features that the Office highlights in Kloba are features that are quite common to any networked or distributed system. In addition, the features that the Office highlights in Kloba are not what the applicant is claiming.

The Office is directed to the disclosure starting on page 12, line 6 where an example of a system implementing the claimed invention is described. In this example, the embodiment is described as being able to launch other local applications, such as email, from a local application.

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In addition, a web site can be accessed from a local application as well as other tasks or actions. Turning to page 13, line 6 of the disclosure, an embodiment of the claimed button portion of the user interface is described. The user can invoke actions by tapping on the button with a stylus. Thus, while a user is operating one application, if an email address appears in the data being viewed, the user can launch a second application, an email application, to send an email to the identified individual. These features are not described, suggested or taught in the Kloba reference which thus, makes it an improper reference for the 35 U.S.C. 103(a) rejection.

The Office admits that Kloba fails to teach providing a software plug-in to automatically launch a second local application and a web site from the first local application. The Office then alleges that Marcus describes such an element in the abstract and at column 3, lines 15-55. The applicant has thoroughly reviewed these citations, as well as the entire Marcus reference. The applicant respectfully asserts that Marcus does not describe, suggest or teach the claimed element. Furthermore, the applicant respectfully asserts in arguendo, that even if Marcus were construed as describing this claim element, there is not motivation whatsoever to have combined Marcus with Kloba.

Claim 1 recites a software plug-in to automatically launch a second local application and a web site from the first local application. Marcus simply describes launching form completion application to complete one or more fields of a browser based form. Such a process is not an automatic launch of a second local application and a web site from a first local application. Thus, the applicant fails to see the connection that the Office is drawing with regards to this reference.

Furthermore, Kloba simply describes a system that allows web content to be downloaded to a portable device so that the device can be used in an off-line mode. Marcus is directed towards automatically filling out common fields in a browser based form. The applicant sees no motivation for combining these references for any purpose, let alone for combining them to perform the function as recited in claim 1. In addition, even if a motivation to combine these references is assumed, neither reference describes, suggests or teaches the claimed user interface

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or the claimed plug-in elements as recited in claim 1. Thus, the applicant respectfully requests the Office to reconsider its rejection of claim 1 and indicate that the claim is allowable.

Claims 2-25 depend either directly or indirectly from claim 1, which is allowable based on the applicant's traversal of the Office's rejection. Thus, claims 2-25 are also allowable and the applicant respectfully requests the Office's agreement.

The Office states that claims 26-74 do not teach or define any new limitations above claims 1-25 and thus, the Office rejections them on the same grounds as claim 1 and its dependent claims. As the applicant has traversed the Office's basis for rejection of claim 1, hence making claim 1 and its dependent claims allowable, then claims 26-74 should also be allowable. However, the applicant also respectfully disagrees with the Office's statement regarding claims 26-74. For instance, the applicant points out that claim 26 includes the ~~additional limitation that the local application from which the other local applications and~~ websites are launched is described as an "already open" application. This is an additional limitation that is not included in claim 1. Thus, the applicant respectfully disagrees with the language asserted by the Office that claims 26-74 do not teach or define any new limitations beyond what claims 1-25 contain.

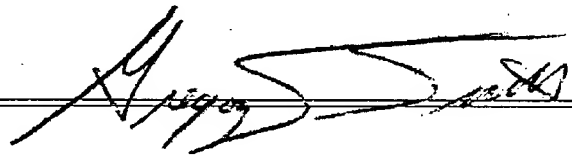
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CONCLUSION

Applicant respectfully submits the claims as presented are allowable over the cited art and respectfully request the Office to move this case towards allowance. The applicant invites the Office to contact the undersigned at its convenience should the Office believe it would facilitate prosecution of this application. Applicant thanks the Examiner for consideration of this application.

Respectfully submitted,



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